Exhibit 12

Plaintiffs' List of Custodians for ZHP and Its Subsidiaries as of 12/5/2019						
First Name	Last name	Title	Department	Co.	Status	Explanation
Senior Management						
Jun	Du	Executive Vice President of ZHP, CEO of Huahai US, Prinston, Solco, and PrinJohnson; Legal Representative of Shaghai Syncores and Prinbury		ZHP, Huahai US, Prinston, Solco, Syncores, and Prinbury	Disputed	Identified in Prinston's core document production more times than we can reference. Most senior manager involved in the day-to-day aspects of management for ZHP, Prinston, & Huahai US. Fully involved in valsartan contamination issues from initial reporting to FDA to present. Identified as a planned attendee in Prinston's 6.18.18 Email Meeting Request to FDA initially advising the FDA of Valsartan's contamination (PRINSTON00000050). Led ZHP's investigation & response to the FDA's 483 observations made during the FDA inspection of Chuannan site 7.23.18 to 8.3.18 (PRINSTON0075644)
Baohua	Chen	Chairman and General Manager		ZHP and PrinJohnson	Disputed	He is the most senior officer in ZHP, and was the chairman of the board of directors. He was involved in a high level into the valsartan contamination investigation. Jun Du reports directly to him.
Analytical Department or "Analysis and Testing Center"						
Min	Li	VP	Analytical Operations	ZHP	Agreed	
Jun	Wang	Finished Dose Gase Stage Team	Chuannan Branch Analytical Center	ZHP	Disputed	Org Chart; involved in testing tetrazole reaction in Valsartan, which is a crucual part of the manufacturing process resulting in the contamination PRINSTON0074146. On 12/4/19, ZHP would not tell Plaintiffs the extent to which this person was involved in Valsartan.
Qing	Wang or possibly just Wangqing			ZHP	P - 10.8.19	Is listed as a user on the chromatograms, which can detect nitrosamines, on the December 2013 solvent change submission to the FDA PRINSTON00073055. As of 12/4/19, ZHP could not identify this person, despite the provision of the referenced document from Core Discovery.
XiaXia	Kuang	Analytical and Testing Department Manager	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	Org Chart. Also referenced in the text version of PRINSTON0076941, where he is designated as a member of the Quality Control Team, which conducted the testing of Valsartan for impurities. As of 12/4/19, ZHP could not identify this person, despite the provision of the referenced document from Core Discovery and the person's presence on its organization chart.
Chun	Yang	Finished Dose Liquid Phase Team	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	The org chart shows that this person had a significant role in ZHP's Analysis and Testing Department. ZHP has not provided Plaintiffs any additional information on this individual. On 12/4/19, ZHP refused to discuss the extent of this custodian's involvement in Valsartan.
Guang	Zheng	Raw Material Central Control Instrument Team	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	The org chart shows that this person had a significant role in ZHP's Analysis and Testing Department. ZHP has not provided Plaintiffs any additional information on this individual.
XianLiang	Zhang	Raw Material Central Control Physico-Chemical Team	Chuannan Branch Analytical Center	ZHP	P - 11.22.19	The org chart shows that this person had a significant role in ZHP's Analysis and Testing Department. ZHP has not provided Plaintiffs any additional information on this individual.
Quality						
Wei	Cheng	VP	API Quality Assurance	ZHP	Agreed	
Jucai	Ge	Director	Quality Assurance (API Division-Chuannan Site)	ZHP	Agreed	
Yuelin	Hu	Assistant Director	Quality Assurance Manager (API Division-Chuannan Site, East Zone)	ZHP	Agreed	
Baozhen	Chen	Director	Corporate Quality Assurance	ZHP	Agreed	
Dongqin	Wang	Assistant Director	Quality Assurance at Chuannan Site East Zone	ZHP	Agreed	
Minli	Zhang	Director	Finished Dose Quality Assurance and Quality Control	ZHP	Agreed	
Qiangming	Li	Director	Quality Control (API Division-Chuannan Site)	ZHP	Agreed	
Wenbin	Chen	Analysis Director	API Quality Research	ZHP	Agreed	
Wenquan	Zhu	Director	API Quality Research	ZHP	Agreed	
Xiaohong	Zhao	Director	Quality Assurance (Chuannan Site)	ZHP	Disputed	Part of core ZHP group identified as meeting attendees regarding the contamination in Duane Morris 6.21.19 correspondence to FDA (PRINSTON00073192)

Hongliang	Wang		Quality	ZHP	Disputed	Prepared Method Validation Report of Valsartan PRINSTON00031401 (According to published literature, "[f]or the pharmaceutical industry, method validation is crucial to ensure the product quality as regards both therapeutic efficacy and patient safety. The most critical step in validating a method is to establish a protocol containing well-defined procedures and criteria. A well planned and organized protocol, such as the one proposed in this paper, results in a rapid and concise method validation procedure for quantitative high performance liquid chromatography (HPLC) analysis." *See* https://conservancy.umn.edu/bitstream/handle/11299/172043/cop_article_496630.pdf?sequence=1&isAllowed=y) ; Checked significant tests for Valsartan impurities See, e.g., PRINSTON00023107; reviewed Method Validation Report of Valsartion for correctness and integrity PRINSTON00022665
Cunxiao (Jenson)	Ye	Vice President	Quality Assurance, Headquarters	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158; Approved the Deviation Investigation Reports (root-cause analysis of the contamination) of Valsartan TEA Process PRINSTON0073443, etc.
Caifeng	Zhao	Manager	Quality Assurance	ZHP	Disputed	Principal Author of ZHP's 11.5.18 Deviation Investigation Report (root-cause analysis of the contamination) of Valsartan TEA Process V1, 2, & 3 PRINSTON0073443, 0075797, 0076100
Y.F.	Chen	Senior Supervisor	API Quality Assurance	ZHP	Disputed	Reviewed Validation Report of Analytical Method for Azide in Valsartan for correctnesss and integrity PRINSTON00018712 (the removal of azide during the manufacturing process is suspected to contribute to the contamination); Reviewed and approved Validation Report of LC-MS Method for NDBA, another nitrosamine, in Losartan Potassium PRINSTON0074642; reviewed and approved the Validation Report of LC-MS Method for NMBA, another nitrosamine, in Irbesartan PRINSTON0074712
Hu	Guangping	Director	Quality Control	ZHP	Disputed	QC Director regarding Valsartan tests related to sodium nitrite, which is suspected to contrbute to the contamination PRINSTON00072721
Huang	Rui	Director	Quality Control	ZHP	Disputed	Referenced in 35 separate documents in core document production, some regarding significant tests for impurities in Valsartan. See, e.g., PRINSTON00023107
Xie	Chaojun	Analyst	Quality Control	ZHP	Disputed	QC Analyst who conducted tests regarding zinc chloride and DMF, both substances suspected of contributing to the contamination: PRINSTON00072692, 72743, and 00080383
Qiang	Zhou	Analyst	Quality Research	ZHP	Disputed	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan Tablets and Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326, 36625
Shang	Fei	QP	Quality VP	ZHP	Disputed	Reviewed and approved the third version of the Deviation Investigation (root-cause analysis) into the Valsartan TEA process PRINSTON0076100
Tong	Wu	Analyst	API Quality Research	ZHP	Disputed	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan Tablets and Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326, 93
Wenping	Hu	Team Leader	Quality Research	ZHP	Disputed	Reviewed Comparison of Valsartan USP Method and In-house Method for Integrity and Correctness PRINSTON00064389 (This document compares the impurities found in USP standard Valsartan with those found in ZHP's Valsartan); Reviewed data in Hydrochlorothiazide Residual Solvent Method Validation Report PRINSTON00064288
Jieyun	Wang	Director	Quality Assurance	ZHP	Disputed	According to the Valsartan DMF, "[s]he is responsible for QA/GMP auditing and the QC/GMP file management for all products" PRINSTON00077850; signed Valsartan cGMP Certification PRINSTON00077832. On 12/4/19, ZHP said this person left ZHP in 2008, and ZHP does not have any of their emails. ZHP could not confirm whether ZHP had any other electronic or physical documents from this person.
Zheng	Youqing	Deputy Manager	Quality Assurance	ZHP	P - 10.8.19	Executed numerous cGMP certifications, and many of Plaintiffs claims are based on violations of cGMPs re Valsartan. See, e.g. PRINSTON00038190
Zhizhang	Ding	Assistant Manager	Formulation Quality Assurance	ZHP	P - 11.12.19	Reviewed and approved Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384; Signed off on correction of the valsartan manufacturing process intended to prevent future contamination PRINSTON00000471
Xiong	Fei	Analyst	Quality Control	ZHP	P - 10.8.19	Analyst of Valsartan tests related to sodium nitrite, which is suspected to contribute to the contamination PRINSTON00080367; 71698; 72721
Yinhua	Tang	Assistant Director/Manager	Quality Control (API Division-Chuannan Site)	ZHP	P - 11.12.19	Reviewed and signed off on Deviation Investigation Reports (root-cause analysis of the contaminat) of Valsartan TEA Process PRINSTON0073443, etc.; attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Yun	Jin	Supervisor	Chuannan Quality Control	ZHP	P - 11.12.19	Drafted Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948 (An assay method validation is the process of determining whether the tests, or assays, are accurate and sufficient; it includes chromatograms); draft Chiral Purity Analytical Method Validation Protocol for TDCI Compound PRINSTON00077405
Tian	Zhang	Analyst	Chuannan Quality Control	ZHP	P - 11.12.19	Reviewed and signed off on Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948 (An assay method validation is the process of determining whether the tests, or assays, are accurate and sufficient; it includes chromatograms); reviewed and signed off on Chiral Purity Analytical Method Validation Protocal for TDCI Compound PRINSTON00077405
Xianhua	Zhang	Deputy Director	Chuannan Quality Control	ZHP	P - 11.12.19	Reviewed and signed off on Assay Method Validation Report for Valsartan (Supplement) PRINSTON00009948 (An assay method validation is the process of determining whether the tests, or assays, are accurate and sufficient; it includes chromatograms); reviewed and signed off on Chiral Purity Analytical Method Validation Protocal for TDCI Compound PRINSTON00077405
Yuping	Chen	Deputy Manager	Formulation Quality Control	ZHP	P - 11.12.19	Author of Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Xiaoling	Li	Manager	Formulation Quality Control	ZHP	P - 11.12.19	Reviewed and signed off on Elemental Impurity Risk Assessment Report for Valsartan Tablets PRINSTON00036384
Tan	Xiao	Senior Supervisor	API Quality Research	ZHP	P - 11.12.19	Drafted Validation Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326; reviewed and approved Validation report of the LC-MS method for NDBA in Losartan Potassium PRINSTON0074642; reviewed and approved the Validation Report of LC-MS Method for NMBA in Irbesartan PRINSTON0074712

Nan	Tong	Senior Supervisor	API Quality Research	ZHP	P - 11.12.19	Approved the cGMP compliance for its intended use of Report of GC-MS Method for Detection of NDMA in Valsartan and Hydrochlorothiazide Tablets PRINSTON00000326
X. G., possibly Xingge	Liu	Quality Researcher	API Quality Research	ZHP	P - 11.12.19	Drafted Validation report of the LC-MS method for NDBA, a nitrosamine, in Losartan Potassium and Irbesartan PRINSTON0074177. ZHP has not told Plaintiffs that this person was not also involved in detecting nitrosamines in Valsartan.
Y.Y. possibly Yangyang	He	Quality Researcher	API Quality Research	ZHP	P - 11.12.19	Drafted Validation Report of LC-MS Method for NMBA, a nitrosamine, in Irbesartan and NMSA in Irbesartan PRINSTON0074712, 75156. ZHP has not told Plaintiffs that this person was not also involved in detecting nitrosamines in Valsartan.
Jian	Ye	Deputy Manager, Group I	Quality Control	ZHP	P - 11.22.19	Put into effect the Method Validation, Report for Assay for Valsartan, which is the process of ensuring that the tests were accurate and adequate PRINSTON00070930
Houming	Zhou	General Detection, Technical Deputy Director	API Quality Study/Research Department	ZHP	P - 11.22.19	ZHP's organization chart shows that this person had a signficant role in ensuring the quality of ZHP's API. ZHP has not provided any additional information regarding this person.
Xiao	Yu	Associate Director	API Quality Study/Research Department	ZHP	P - 11.22.19	ZHP's organization chart shows that this person had a signficant role in ensuring the quality of ZHP's API. ZHP has not provided any additional information regarding this person.
Yang	Han	Supervisor	Quality Research	ZHP	P - 11.22.19	ZHP's organization chart shows that this person had a signficant role in ensuring the quality of ZHP's API. ZHP has not provided any additional information regarding this person.
Chaohua	Bao	Supervisor	API QR	ZHP	P - 11.22.19	Prepared Comparison of Valsartan USP Method and In-house Method PRINSTON00064389; put into effect the Method Validation for Valsartan PRINSTON00022665
Jianzhi	Zhao		QA	ZHP	P - 12.2.19	Audit consistency of document and cGMP compliance in many documents See, e.g., throughout PRINSTON00022331-23004; PRINSTON00010056. Many of Plaintiffs' claims are based on violations of cGMPs.
Meng	Zheng	Manager	QA	ZHP	P - 12.2.19	Signed cGMP Certification for Valsartan PRINSTON00022284. Many of Plaintiffs' claims are based on violations of cGMPs.
Manufacturing						
Xiaoming	Liu	Head	Technical for Finished Dose	ZHP	Agreed	
Peng	Dong	Deputy Director	Technical Department	ZHP	Agreed	
Peng	Wang	Senior Director	ZHP Facility Director API Manufacturing Chuannan Site, West Zone	ZHP	Agreed	
Wenling	Zhang	Director Assistant	Technical, API Chuannan site West Zone (counterpart to Peng Dong)	ZHP	Agreed	
Wei	Chen	Deputy Director	Production Department	ZHP	Agreed	
Yongjun	Jin	Factor Assistant Director	Manufacturing	ZHP	Disputed	Identified in Valsartan DMF as a "professional engineer," and "has a wide experience at production technology management and is responsible for the technological development of all bulk drugs" PRINSTON00077836
Youhu	Wang	Deputy Director of Production and Operation		ZHP	Disputed	Identified in Valsartan DMF as "responsible for Valsartan" PRINSTON00077836; appears in the text of later documents, such as ZHP's Response to the FDA's August 2018 inspection PRINSTON0074892
Jiangzhong	Yu	API and Intermediate Plant Manager	Manufacturing	ZHP	Disputed	Identified in Valsartan DMF as responsible for all bulk drugs (including intermediates) at ZHP PRINSTON00077836
Lijin	Jiang	VP	API Operations/Facility Director, API Chuannan Site, East Zone	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Zhengjun	Jia	Deputy Plant Director	Engineering and Maintenance, API Chuannan site East Zone	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Junhui	Zuo	Deputy Plant Director	Engineering and Maintenance, API Chuannan site West Zone	ZHP	Disputed	Attended close out meeting on 5.19.17 regarding FDA inspection PRINSTON0074158
Chunmin	Xu	Vice President		ZHP	Disputed	Identified as Valsartan personnel in DMF PRINSTON00070584, 79392. On 12/4/19, ZHP said this person left ZHP in 2015, and ZHP does not have any of their emails. ZHP could not confirm whether ZHP had any other electronic or physical documents from this person.
Ruqi	Yao	Factory Assistant Director		ZHP	Disputed	Identified as Valsartan personnel in DMF PRINSTON00070587, 79392. On 12/4/19, ZHP said this person left ZHP in 2012, and ZHP does not have any of their emails. ZHP could not confirm whether ZHP had any other electronic or physical documents from this person.
Kai	Yang	Technical Manager		ZHP	Disputed	Identified as Valsartan personnel in DMF PRINSTON00070587, 79392. On 12/4/19, ZHP said this person left ZHP in 2014, and ZHP does not have any of their emails. ZHP could not confirm whether ZHP had any other electronic or physical documents from this person.
Meng	Yanhua	General Manager	Chuannan Product Technical Center	ZHP	Disputed	The head of ZHP's manufacturing department at the facility that manufactured Valsartan, presumably communicated between her subordinates, other departments, and senior management regarding Valsartan manufacturing.

Lina	Wu	Senior Supervisor	Formulation Technology at ZHP	ZHP	P - 11.12.19	Author of Elemental Impurity Risk Assessment Report for Valsartan Tablets and Valsartan and Hydrochlorothiazide Tablets PRINSTON00036384, 70161
Hu	Zhou	Factory Director		ZHP	P - 11.22.19	Identified as Valsartan personnel responsible for production and technology in DMF PRINSTON00070586
Yan	Fengfeng	Director of Tech	Chuannan Product Technical Center	ZHP	P - 11.22.19	As the second in command at ZHP's Technical Department in the facility manufacturing Valsartan API, this person was responsible for developing the manufacturing process for Valsartan.
Liang	Zunjun	Associate Director	Chuannan Product Technical Center	ZHP	P - 11.22.19	The assistant to Dong Peng, who ZHP admits is a proper custodian. ZHP has not given Plaintiffs any additional information regarding this person.
Hu	Zhichen	Manager	Chuannan Product Technical Center	ZHP	P - 11.22.19	Manager in the department that developed the manufacturing process for Valsartan. ZHP has not given Plaintiffs any additional information regarding this person.
Zhan	Xiaohui	"(Valsartan)"	Chuannan Product Technical Center	ZHP	P - 11.22.19	This person's title is Valsartan. They are in the department that developed the manufacturing process for Valsartan. ZHP has not given Plaintiffs any additional information regarding this person.
Regulatory						
Lihong (Linda)	Lin	Director	Regulatory Affairs Department	ZHP	Agreed	
Yanfeng (Lucy)	Liu	Deputy Director / Manager	Regulatory Affairs	ZHP	Agreed	
Ying	Xiong	Supervisor	Regulatory Affairs	ZHP	Agreed	
Ting (Ada)	Zhou	Assistant Director	Regulatory Affairs	ZHP	Agreed	
Jie	Lin	Deputy Manager	API Patent, Regulation Affairs	ZHP	Disputed	Head of patents at ZHP, which has patents regarding Valsartan, one of which is for the manufacturing process that led to the contamination.
Sun	Dengxue	Manager	API R&D, Regulation Affairs	ZHP	P - 11.22.19	Manager of API Research and Development in the Regulatory Department that handled Valsartan. ZHP has not given Plaintiffs any additional information regarding this person.
Procurement						
Min	Hu		Purchasing	ZHP	Agreed	
Weiwei	Xu		Purchasing	ZHP	Agreed	
Min	Xu		Purchasing	ZHP	Agreed	
Zheng	Gaozhe		Purchasing	ZHP	Agreed	
API Sales						
Minda	Cai	Former VP	API Sales	ZHP	Agreed	
Jie	Wang	VP	Business Development	ZHP	Agreed	
Sheng	Zhong	Director	Business Development	ZHP	Agreed	
Hongchao	Li	Manager	Business Development	ZHP	Agreed	
Mi	Xu		Business Development, API Sales	ZHP	Agreed	
Yihua	Wang	Vice President	Sales	ZHP	Disputed	Co-head of ZHP's Sales Department, which handled Valsartan. ZHP has said that she is a recent hire, but has not said how recent. ZHP also admits that she has knowledge of the Valsartan recall.
Fengyang	Tang	Manager Assistant, Business Group I	Sales	ZHP	Disputed	Manager in the Sales Department who handled Key Accounts for Valsartan. ZHP has not told Plaintiffs that Fengyang Tang and Lina Wang did not both work on Valsartan.
Lina	Wang	Manager Assistant, Business Group II	Sales	ZHP	Disputed	Manager in the Sales Department who handled Key Accounts for Valsartan. ZHP has not told Plaintiffs that Fengyang Tang and Lina Wang did not both work on Valsartan.
Tong	Zengyuan	Director of Customer Service Department	Sales	ZHP	P - 11.22.19	As the Director of Customer Service, this person very likely dealt with customer complaints regarding Valsartan. ZHP has not provided any additional information regarding this person.
Wu	Yuehua	Manager of Document Group	Sales	ZHP	P - 11.25.19	As the manager of the Document Group in the Customer Service Department, this person is a critical cutodian. ZHP has not given Plaintiffs any additional information regarding this custodian.
Wang	Haiqun	Assistant Manager of Office Work Group	Sales	ZHP	P - 11.25.19	The Assistant Manager in the Customer Service Department. ZHP has not given Plaintiffs any additional information regarding this custodian.
Huahai US						
Xiaodi	Guo	Executive Vice President and Chief Scientific Officer for Prinston & Huahai US		Huahai US (linkedin), Prinston (website), and Solco (affidavits of service)	Agreed	

Hai	Wang	President since 2005		Vice President at Huahai US since 2005 (Linkedin), Sr. Vice President at Prinston (Linkedin), & President at Solco (Prinston's website)	Agreed	
John	Iozzia	Director	Sales	Huahai US	Agreed	
Zhi	Chen			Huahai US	Disputed	Listed as contact for ZHP's US Agent to the FDA for Valsartan, Huahai US PRINSTON00072295
Qun (Kathy)	Zhang	Senior Manager	Regulatory Affairs	Huahai US	Disputed	Author of Cover Letter re: Valsartan ANDA PRINSTON00066953-54; Listed as contact for the US Agent, Huahai US, for Valsartan PRINSTON00073120; Same PRINSTON00072212
Min (Michelle)	Hu	Manager of Business Development and Senior Director of Business Development		Huahai US (2007-2012) and Prinston (2012-Present), respectively	Disputed	Given her title and Huahai US's and Prinston's significant role in bringing ZHP's Valsartan to the United States, Plaintiffs believe that she has important, relevant, and probative documents in this case. The ZHP defendants do not dispute this. They simply say that other custodians "have superior information related to Valsartan."
Yiming	Tang				P - 11.22.19	Contact Person for ZHP's U.S. Agent to FDA for Valsartan PRINSTON0076915 and many other documents regarding Huahai US as ZHP's U.S. agent to the FDA for Valsartan PRINSTON00010626, PRINSTON00008984, PRINSTON00078888, etc.
Prinston						
Xiaodi	Guo	Executive Vice President and Chief Scientific Officer for Prinston & Huahai US		Huahai US (linkedin), Prinston (website), and Solco (affidavits of service)	Agreed	
Hai	Wang			Vice President at Huahai US since 2005 (Linkedin), Sr. Vice President at Prinston (Linkedin), & President at Solco (Prinston's website)	Agreed	
Chris	Keith	Senior Vice President / VP	Sales	Solco/Prinston at some point as VP	Agreed	
Remonda	Gergis	VP	Quality Assurance	Prinston	Agreed	
Lijie	Wang	VP	Head of Regulatory Affairs	Prinston	Agreed	
Minfa	Wang	VP	Analytical Operations and Quality Control	Prinston	Disputed	She is a senior officer of Prinston, in charge of Analytical Operations and Quality Control. Identified as a planned attendee in Prinston's 6.18.18 Email Meeting Request to FDA initially advising the FDA of Valsartan's contamination (PRINSTON00000050).
Wei (Helena)	Tong	Director	Regulatory Affairs	Prinston	Disputed	Listed on ANDA Documents, Signed ANDA, and routinely corresponded with the FDA. For example, PRINSTON00037372, PRINSTON00054685, , PRINSTON00031790. Her full name appears in 106 documents from Core Discovery.
Guangyu	Luo	Associate (2013-2015), Senior Associate (2015-2016), Specialist (2016-2017), Manager (2017-Present)		Prinston	Disputed	Signed ANDA for Valsartan PRINSTON00066560, PRINSTON00033715, PRINSTON00034648, PRINSTON00066787, PRINSTON00066707, PRINSTON00066848; "Regulatory Affairs, mainly on regulatory submissions (from draft to e-CTD compilation), pharmacovigilance (AE handling and submission) and generic labeling (content, artwork and SPL)." -Linkedin
Lesley	Zhu	SVP, Business Development & Portfolio	Sales	Prinston	Disputed	Received email from Frederick Ball re: FDA correspondence along with Jun Du; Same PRINSTON0073198; Cc'd on letter to FDA with Jun Du PRINSTON00079000; Sent letter to FDA re: authorizing the FDA to share information with the EMA PRINSTON00070470-71; PRINSTON0073192-96; Cc'd on letter to FDA with Jun Du PRINSTON00079001-02

Min (Michelle)	Hu	Manager of Business Development and Senior Director of Business Development		Huahai US (2007-2012) and Prinston (2012-Present), respectively	Disputed	Given her title and Huahai US's and Prinston's significant role in bringing ZHP's Valsartan to the United States, Plaintiffs believe that she has important, relevant, and probative documents in this case. The ZHP defendants do not dispute this. They simply say that other custodians "have superior information related to Valsartan."
Peng	Shang	Senior Associate of Business Development/Supply Chain (2016-Present)		Prinston	Disputed	Given this person's title and Prinston's significant role in bringing ZHP's Valsartan to the United States, Plaintiffs believe that she has important, relevant, and probative documents in this case. The ZHP defendants do not dispute this. They simply say that other custodians "have superior information related to Valsartan."
Ning	Zhang	Specialist	Regulatory Affairs	Prinston	P - 12.2.19	Regulatory Affairs Approval for Corrected Valsartan Manufacturing Process PRINSTON00000479
Solco						
Xiaodi	Guo	Executive Vice President and Chief Scientific Officer for Prinston & Huahai US		Huahai US (linkedin), Prinston (website), and Solco (affidavits of service)	Agreed	
Hai	Wang			Vice President at Huahai US since 2005 (Linkedin), Sr. Vice President at Prinston (Linkedin), & President at Solco (Prinston's website)	Agreed	
Chris	Keith	Senior Vice President / VP	Sales	Solco/Prinston at some point as VP	Agreed	
David	Ayres	Vice President (2018-Present); Executive Director, Sales (2016-2018); Senior Director of National Accounts (2014-2016); Director of National Accounts (2012-2013); National Account Manager (2010-2012)	Sales	Solco	Agreed	
Matthew	Arnold	National Account Manager from		Solco	Disputed	Author of Only Solco-stamped document, a list of Valsartan customers. He must have have many other documents regarding these customers. Solco has not said otherwise.
Shanghai Syncores Technologies, Inc.						
Eric	Gu	Manager		Shanghai Syncores	P - 10.8.19	On list of planned attendees for meeting with FDA re: the contamination PRINSTON0073192-96. Syncores developed the manufacturing process for the contaminated Valsartsan, and his inclusion on this list establishes that he has signficant knowledge about Syncores' involvement in the contamination.
Prinbury BioPharm Ltd.						
Dachuan	Zhao	Executive Deputy General Manager of Prinbury		Prinbury	P - 11.12.19	Attended close out meeting on 5.19.17 regarding FDA inspection, identified as Vice President of Analytical Shanghai R&D Center PRINSTON0074158; "Dr. Zhao has comprehensive and in-depth understanding and rich experience in key areas such as product development (QbD), analysis, product declaration, quality control, quality assurance, FDA regulations, and FDA audits." -Prinbury website (via Google Translate). Identified in core discovery as Vice President. Analytical, Shanghai R&D Center PRINSTON0076915. Prinbury developed the finished dose manufacturing process for Valsartan, including many of the tests conducted during that process, as shown below.

Li or Lily	Tan	Director	Project Management	Prinbury	P - 11.12.19	Worked on numerous important Valsartan documents, many of which involed chromatography, which can detect nitrosamines: Reviewed and Signed Off on Method Robustness Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039541; Reviewed and Signed Off on Method Validation Report on Identification, Assay and Content Uniformity Determination of Valsartan PRINSTON00020805; Approved Method Verification Report for Valsartan PRINSTON00039715; Reviewed and signed off on Dissolution Comparison Study Report of Valsartan PRINSTON00029309; Approved Method Validation Report re: Dissolution Test of Valsartan and Hydrochlorothiazide PRINSTON 00039663; Approved Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Approved Method Verification Report re: Organic Impurities Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039715; Approved USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039499; Approved Submission Batch Stability Study Report for Valsartan and Hyrdochlorothiazide PRINSTON00064193; Reviewed and Signed Off on Method Robustness Study Report re: Dissolution Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039645; Approved Method Verification Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039800; "12 years of experience in drug development, analysis, quality management and project management. Good at the establishment and management of quality system and project management system. Familiar with US FDA policies, regulations, cGMP specifications and ICH guidelines, and proficient in FDA registration requirements. Participated and successfully passed GMP audits of FDA, EMEA and CFDA." -Prinbury website (via Google Translate).
Wei	Tian	Deputy General Manager of Analysis and Research		Prinbury	P - 11.12.19	This person was previously on the Prinbury website, but no longer is. Wei Tian's title and Prinbury's work on Valsartan establish that Wei Tian is likely to have worked on Valsartan related issues and potentially had involvement in and/or is knowledgeable as to how it was tested, among other things.
Shine	Chen	Scientist		Prinbury	P - 11.12.19	Worked on numerous important Valsartan documents, many of which involed chromatography, which can detect nitrosamines: Prepared Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Prepared Method Verification Report re: Organic Impurities Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039715; Prepared Submission Batch Stability Study Report re: Valsartan and Hyrdochlorothiazide PRINSTON00064193; Prepared USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hydrochlorothiazide PRINSTON00039499; Prepared Method Validation Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039560; Prepared Dissolution Comparison Study Report re: Valsartan PRINSTON00029309; Prepared USP Method Equivalence Study Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039603; Prepared Method Robustness Study Report re: Dissolution Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039645
Tina	Liu	Senior Scientist		Prinbury	P - 11.12.19	Worked on numerous important Valsartan documents, many of which involed chromatography, which can detect nitrosamines: Reviewed and Signed Off on Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Reviewed Method Verification Report re: Organic Impurities Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039715; Prepared USP Method Equivalence Study Report re: Assay Determination of Valsartan PRINSTON00020861; Reviewed and Signed Off on Method Validation Report re: Dissolution Test of Valsartan and Hydrochlorothiazide PRINSTON00039663; Prepared Method Validation Report re: Organic Impurities Determination for Valsartan PRINSTON00020905; Reviewed and Signed Off on Dissolution Comparision Study Report for Valsartan and Hyrdochlorothiazide PRINSTON00050114; Reviewed and Signed Off on Submission Batch Stability Study Report re: Valsartan and Hyrdochlorothiazide PRINSTON00064193; Reviewed and Signed Off on USP Method Equivalence Study Report re: Dissolution Test of Valsartan and Hydrochlorothiazide PRINSTON00039603; Reviewed and Signed off on USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039499; Reviewed and Signed Off on Method Verification Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039800
Yun	Tian	Senior Director		Prinbury	P - 11.12.19	Approved Method Validation Report on Identification, Assay and Content Uniformity Determination of Valsartan PRINSTON00020805; Approved Method Verification Report re: Identification and Assay Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039439; Approved Method Robustness Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039541; Approved Method Verification Report re: Organic Impurities Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039715; Approved Dissolution Comparison Study re: Valsartan PRINSTON00029309; Approved Dissolution Comparison Study Report re: Valsartan and Hyrdochlorothiazide PRINSTON00050114; Approved Method Validation Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039663; Approved USP Method Equivalence Study Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039603; Approved USP Method Equivalence Study Report re: Content Uniformity Determination of Valsartan and Hyrdochlorothiazide PRINSTON00039499; Approved Method Validation Report re: Content Uniformity Determination of Valsartan PRINSTON000395560; Approved Submission Batch Stability Study Report for Valsartan and Hyrdochlorothiazide PRINSTON00064193; Approved Method Robustness Study Report re: Dissolution Determination for Valsartan and Hyrdochlorothiazide PRINSTON00039645; Approved Method Verification Report re: Dissolution Test of Valsartan and Hyrdochlorothiazide PRINSTON00039800; She "is responsible for the development and validation of analytical methods for pharmaceutical products. 11 years of experience in the analysis, development and quality control of APIs and pharmaceutical preparations. He is good at quality research and control in the drug development process of IND and NDA, including the relevant stability tests. Rich cGMP analysis laboratory team construction and management experience, familiar with FDA / EMEA cGMP regulations, and participated in multiple FDA, EMEA cGMP audits." -Prinbury website (via Google Translate)
Alex	Liu	Scientist		Prinbury	P - 11.12.19	Worked extensively on USP Method Equivalence Study Report on Assay Determination using Chromatography, which can detect nitrosamines, of Valsartan PRINSTON00020861; Prepared Dissolution Comparison Study Report of Valsartan PRINSTON00050114;
Ashley	Lin	Associate Scientist		Prinbury	P - 11.12.19	Prepared Method Robustness Study Report for Content Uniformity Determination, using Chromatography, which can detect nitrosamines, of Valsartan PRINSTON00039541; Prepared USP Method Equivalence Study Report, using Chromatography, which can detect nitrosamines, re: Dissolution Test of Valartan PRINSTON00021157; Prepared Method Validation Report for Dissolution Test, using Chromatography, which can detect nitrosamines, of Valsartan and Hydrochlorothiazide PRINSTON00039663

Yulu (Luke)	Wang	Executive Director		Prinbury	P - 11.12.19	Reviewed and approved many Master Production Batch Record Approval See, e.g., PRINSTON00064070, PRINSTON00063906, PRINSTON00063742, PRINSTON00038525. Batch Records contain actual data and step by step process for manufacturing each batch. Batch manufacturing record is like a proof that batches were properly made and checked by quality control personnel. *See* https://process-xe.sarjen.com/batch-manufacturing-records-important-according-gmp/.
Angela	An	Scientist		Prinbury	P - 12.2.19	Prepared Method Validation Report on Identification, Assay and Content Uniformity Determination of Valsartan, using Chromatography, which can detect nitrosamines PRINSTON00020805